

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications) Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS PAUL M. LION
(OCA/USPS-T4-38-43)
(August 6, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA Interrogatories 1-4 to the United States Postal Service dated June 19, 1996, are hereby incorporated by reference.

Respectfully submitted,

Gail Willette

GAIL WILLETTE
Director
Office of the Consumer Advocate

Shelley Dreifuss

SHELLEY DREIFUSS
Attorney



OCA/USPS-T4-38. Refer to LR-SSR-104, Exhibit II, and column "Form 1901's Volumes." Please confirm that the figure 8,577 represents the total number of separations.

- a. If you do not confirm, please explain in detail what this figure represents.
- b. If you do confirm, please reconcile this figure with the 233,786 "Caller Numbers or Separations," on page 1 of LR-SSR-104.

OCA/USPS-T4-39. Refer to LR-SSR-104, page 1. Please confirm that the figure 233,786, "Total Number of Separations," was derived by multiplying the total number of firms (100,700) by the "Separations per Caller" (2.32).

- a. If you do not confirm, please explain.
- b. If you do confirm, please provide a count of call numbers (not firms) or, in the alternative, a list of call numbers assigned.

OCA/USPS-T4-40. Refer to LR-SSR-104, Exhibit IV. Please provide all data and calculations used to derive the figure 4.1, the "Number of Square Feet Allocated per Firm".

OCA/USPS-T4-41. Refer to Table 18 of your testimony concerning the attributable costs of post office boxes. Please confirm that the cost of parcel lockers is included in the total attributable costs per box.

- a. If you do not confirm, please explain the rationale for excluding the cost of parcel lockers from attributable costs.
- b. If you do confirm, please explain where and how the cost of parcel lockers has been included in attributable costs.

OCA/USPS-T4-42. Refer to Table 4 of your testimony concerning the number of post office boxes in use. Please provide the number of post office box customers that also receive city, rural or highway contract delivery service by Delivery Group I-A, I-B and I-C, and Delivery Group II.

OCA/USPS-T4-43. Refer to Table 7 of your testimony concerning facilities reporting space to expand.

- a. Please provide the number of post offices reporting that the number of boxes in use for each box size equaled the number of boxes installed for each box size by Delivery Group I-A, I-B and I-C, and Delivery Group II.

- b. Please provide the number of post offices identified in "a" above that also reported space available to expand the number of post office boxes by Delivery Group I-A, I-B and I-C, and Delivery Group II.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.


SHELLEY DREIFUSS
Attorney

Washington, D.C. 20268-0001
August 6, 1996